

OBJECTION DEADLINE: February 17, 2016 at 2:00 p.m. (Eastern Time)
HEARING DATE/TIME: February 10, 2016 at 5:00 p.m. (Eastern Time)

PREET BHARARA
United States Attorney for the
Southern District of New York
By: DAVID S. JONES
Assistant United States Attorney
86 Chambers Street, Third Floor
New York, New York 10007
Telephone: (212) 637-2739
Facsimile: (212) 637-2730

Attorney for United States of America

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

-----X	
	:
In re	:
	:
MOTORS LIQUIDATION COMPANY, <i>et al.</i>,	:
f/k/a General Motors Corp., <i>et al.</i>	:
	:
Debtors.	:
	:
-----X	

Chapter 11

Case No. 09-50026 (MG)

(Jointly Administered)

**NOTICE OF MOTION OF UNITED STATES OF AMERICA FOR AN ORDER
APPROVING RE-APPOINTMENT OF EPLET LLC TO A SECOND TERM AS
ADMINISTRATIVE TRUSTEE OF THE ENVIRONMENTAL RESPONSE TRUST**

PLEASE TAKE NOTICE that upon the annexed Motion, dated February 1, 2016 (the “**Motion**”), of the United States of America, pursuant to section 105 of the Bankruptcy Code, seeking the entry of an order re-appointing of EPLET, LLC, by and through Elliott P. Laws, Esq., as Administrative Trustee of the Revitalizing Auto Communities Environmental Response Trust (“**RACER**”), which is charged pursuant to an Environmental Response Settlement Trust Settlement Agreement and Consent Decree approved by the Court on July 5, 2009, with carrying out needed environmental actions at certain properties formerly owned by

Debtor Motors Liquidation Company (f/k/a General Motors Corporation, hereafter, “**MLC**”), and its affiliated debtors, (collectively, the “**Debtors**”), a hearing will be held before the Honorable Martin Glenn, United States Bankruptcy Judge, in Room 501 of the United States Bankruptcy Court for the Southern District of New York, One Bowling Green, New York, New York 10004, on **February 17, 2016, at 2:00 p.m. (Eastern Time)**, or as soon thereafter as counsel may be heard.

PLEASE TAKE FURTHER NOTICE that if no responses or objections are timely filed and served with respect to the Motion, the United States of America may, on or after the Objection Deadline, submit to the Bankruptcy Court an order substantially in the form of the proposed order annexed to the Motion, which order may be entered with no further notice or opportunity to be heard offered to any party.

[Remainder of page intentionally left blank]

Dated: New York, New York
February 1, 2016

PREET BHARARA
United States Attorney for the
Southern District of New York

By: s/ David S. Jones
DAVID S. JONES
Assistant United States Attorney
86 Chambers Street, Third Floor
New York, NY 10007
Tel: 212-637-2739
Fax: 212 637 2730
David.jones6@usdoj.gov

Attorney for the United States

TO: All parties via ECF notification

And by email to:

Joseph Smolinsky, Esq.
Thomas Moers Mayer, Esq.
Matt Williams, Esq.
Carl Garvey, Esq.
Counsel for all remaining signatories to the Environmental Response Trust Settlement
Agreement and Consent Decree

And by fax to the Office of the U.S. Trustee